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Attorneys for Defendants CITY OF ANDERSON,
SEAN MILLER, JEFFREY MILEY, and KAMERON LEE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

THERESE L. LESHER,)	Case No. 2:21-cv-00386-WBS-DMC
)	
Plaintiff,)	STIPULATION AND ORDER EXTENDING
)	THE DATES FOR DISCOVERY CUTOFF AND
vs.)	TRIAL IN CURRENT SCHEDULING ORDER
)	(ECF NO. 75)
CITY OF ANDERSON, et al.,)	
)	
Defendants.)	
)	

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PURSUANT TO CIVIL LOCAL RULE 144 (Fed. R. Civ. P. 16(b)(1)(A)), THE PARTIES HEREBY RESPECTFULLY STIPULATE, THROUGH THEIR ATTORNEYS OF RECORD, AS FOLLOWS:

1. The parties have worked cooperatively together, in good faith, to accomplish the necessary discovery and depositions.
2. Due to circumstances out of the control of the parties or counsel, the parties wish to extend the deadlines for the cut off for fact discovery and the trial. The parties have been working diligently on the matter having taken additional fact witness depositions, multiple expert witness depositions, and fully briefed a motion for partial summary judgment in the last few months. Both sides agree that a short, additional round of depositions are necessary.
3. At this time, the parties agree that expert discovery is complete. However, if Plaintiff obtains a surgery or significant medical treatment related to this incident before trial, the parties agree that expert discovery needs to be reopened for the defense to evaluate the treatment, surgery, and billings as well as potentially perform a defense medical examination. This will necessitate a redesignation of damages experts with further Rule 26 reports as well as an additional continuance of the trial.
4. Based on the logistical challenges that necessitate this extension, the parties respectfully stipulate and request that the following dates/deadlines be extended as follows:

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Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact including compliance with any Motion to Compel Order)	Past	April 1, 2025
Final PreTrial Conference	February 10, 2025	May 19, 2025
Trial	April 1, 2025	July 22, 2025

Respectfully Submitted,

Dated: January 17, 2025

**LAW OFFICE OF SANJAY S. SCHMIDT
-and-
LAW OFFICES OF PANOS LAGOS**

/s/ Panos Lagos

By: Panos Lagos
Attorneys for Plaintiff,
THERESE L. LESHER

Dated: January 17, 2025

ANGELO, KILDAY & KILDUFF, LLP

/s/ Kevin J. Dehoff

By: Kevin Dehoff
KEVIN J. DEHOFF
Attorneys for Defendants CITY OF ANDERSON,
SEAN MILLER, JEFFREY MILEY, and
KAMERON LEE

*Pursuant to Local Rule 131(e), counsel has authorized submission of this document on counsel's behalf.

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ORDER

Pursuant to the parties' Stipulation and good cause appearing, the deadlines in this case are hereby modified by the Court as follows:

Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact, including compliance with any Motion to Compel Order)	Past	April 1, 2025
Final PreTrial Conference	February 10, 2025	May 19, 2025, 1:30 p.m.
Trial	April 1, 2025	July 22, 2025, 9:00 a.m.

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: January 17, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE